

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VALASSIS COMMUNICATIONS, INC.,

Plaintiff,

v.

NEWS CORPORATION; NEWS AMERICA
MARKETING, a/k/a NEWS AMERICA
INCORPORATED, a/k/a NEWS AMERICA
MARKETING GROUP, a/k/a NEWS AMERICA
MARKETING FSI L.L.C., a/k/a NEWS
AMERICA MARKETING FSI, INC.; and NEWS
AMERICA MARKETING IN-STORE
SERVICES L.L.C., a/k/a NEWS AMERICA
MARKETING IN-STORE SERVICES, INC.,

Defendants.

Case No. 1:17-cv-07378-PKC

NOTICE OF MOTION TO FILE DOCUMENTS UNDER SEAL

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum; the Declaration of Brette Tannenbaum, dated June 8, 2018, and accompanying exhibits; the Declaration of Louis F. Manzo, dated June 8, 2018; and all other papers and proceedings in this matter, Defendants (collectively “NAM”), pursuant to Section 5 of this Court’s Individual Practices, will move this Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time to be determined by the Court, for an order (i) granting Defendants’ application to redact sensitive financial and business information in certain of the exhibits NAM intends to file in support of its forthcoming reply memorandum of law in further support of its Motion for Summary Judgment and to file under seal any material previously filed by Plaintiff in redacted form in its Rule 56.1 Counterstatement of Facts; and (ii)

permitting NAM to refile in support of its forthcoming reply memorandum of law in further support of its Motion for Summary Judgment exhibits subject to prior sealing applications in this matter (Dkts. 192, 196, 213, 216) in the form in which those exhibits were previously filed on the docket.

Dated: June 8, 2018

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

By: /s/ Kenneth A. Gallo
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CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2018, I electronically filed the foregoing, the accompanying Declarations of Brette Tannenbaum and Louis F. Manzo in Support of Defendants' Motion to File Documents Under Seal, and the accompanying proposed Order with the Clerk of the Court using the ECF system which will serve all counsel of record; and caused the exhibits annexed to the Declaration of Brette Tannenbaum to be served via email upon counsel for Plaintiff.

/s/ Kenneth A. Gallo
Kenneth A. Gallo